

## United States District Court

DISTRICT OF Massachusetts

UNITED STATES OF AMERICA

## WARRANT FOR ARREST

v.

Marcia Ferreira de Almeida  
 486 Hope Street, Apartment #7  
 Fall River, Massachusetts

CASE NUMBER: 04-1100014-LPC

To: The United States Marshal  
 and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest \_\_\_\_\_

Marcia Ferreira de Almeida  
 Name \_\_\_\_\_

and bring him or her forthwith to the nearest magistrate judge to answer a(1)

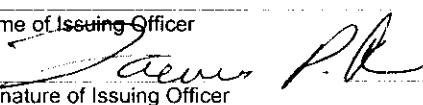
Indictment  Information  Complaint  Order of court  Violation Notice  Probation Violation Petition

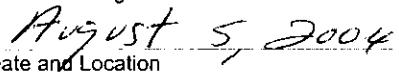
charging him or her with (brief description of offense)  
 knowingly transferring an identification document knowing that such document was produced without authority

in violation of  
 Title \_\_\_\_\_

18

United States Code, Section(s) 1028(a)(2)

Lawrence P. Cohen  
 Name of Issuing Officer  
  
 Signature of Issuing Officer

United States Magistrate Judge  
 Title of Issuing Officer  
  
 Date and Location

Bail fixed at \$ \_\_\_\_\_

by \_\_\_\_\_

Name of Judicial Officer

## RETURN

This warrant was received and executed with the arrest of the above-named defendant at 486 Hope St.,  
 Apt. #7, Fall River, MA

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

# United States District Court

DISTRICT OF Massachusetts

UNITED STATES OF AMERICA

v.

Marcia Ferreira de Almeida  
 486 Hope Street, Apartment # 7  
 Fall River, Massachusetts

(Name and Address of Defendant)

**CRIMINAL COMPLAINT**

CASE NUMBER: 04-M-00014-LR

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 4-July 19, 2004 in Bristol county, in the District of Massachusetts defendant(s) did, (Track Statutory Language of Offense) knowingly transfer an identification document knowing that such document was produced without authority

in violation of Title 18 United States Code, Section(s) 1028(a)(2).

I further state that I am a(n) Special Agent, ICE and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof:

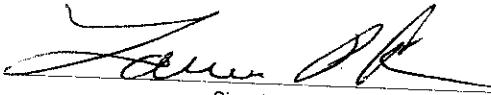
 Yes No


Signature of Complainant

Sworn to before me and subscribed in my presence,

Date August 5, 2004 at Boston, Massachusetts  
 City and State

Lawrence P. Cohen  
 United States Magistrate Judge  
 Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT OF THOMAS OHLSON

I, Thomas L. Ohlson, having been duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the United States Bureau of Immigration and Customs Enforcement ("ICE", legacy of Immigration and Naturalization Service), and have been so employed since April, 1999. Among other duties, I am assigned to investigate the manufacture and sale of fraudulent resident alien cards, which are also known as Forms I-551, or "green cards". From my training, I know that persons, usually aliens, manufacture and distribute counterfeit resident alien cards, as well as counterfeit social security account number cards ("social security cards") and other false identification documents. The counterfeit documents are then sold to aliens who are illegally in the United States or who do not have permission to work in the United States. I am familiar with the various criminal statutes pertaining to the enforcement of immigration laws which make it unlawful to manufacture and sell green cards, including Title 18, United States Code, Section 1028(a)(2) (knowingly transferring an identification document knowing that such document was produced without authority).

2. I submit this affidavit in support of a criminal complaint against Marcia FERREIRA DE ALMEIDA, a/k/a Marcia ALMEIDA, for violations of Title 18, United States Code, Section 1028(a)(2) and in support of a search warrant for the residence of Marcia FERREIRA DE ALMEIDA, located at 486 Hope Street, Apartment #7, Fall River, Massachusetts.

3. This affidavit is based on my personal knowledge, and information provided to me by other law enforcement officers, as well as agents of this service. This affidavit is not intended to set forth all of the information that I, and other law enforcement personnel have learned during this investigation, but rather consists of that

information necessary to support a criminal complaint and search warrant application.

4. The premises to be searched are more particularly described as follows. Apartment #7 is located on the third floor of 486 Hope Street, Fall River, Massachusetts. The structure at 486 Hope Street is a three-story, light-brown apartment building with approximately eight units. Located at the intersection of Hope Street and Union Street, the building has outside porches (with white railings), and a brick foundation. A driveway exists adjacent to 486 Hope Street. The address "486 Hope Street" is written in black letters in the front of the residence. On the outside of the building (facing Union Street), there are located eight non-numbered mailboxes affixed to the structure. The main entrance to 486 Hope Street, on the Hope Street side of the building, is accessed by four concrete steps which lead to an outer white screen door, and inner brown door. Across from the main entrance is a winding staircase that leads to the second and third floors. A total of 14 steps exist between the first and second floors, and 14 steps between the second and third floors. Apartment #7, located on the third floor, can be found on the right-side of the hall at the top of the stairs. The entrance to Apartment #7 is a brown door with a black "7" written over the peephole. On the opposite side of the hall from Apartment #7 is located Apartment #8 (on the left side of the hall). An outside porch is located directly across from the stairs, between Apartments #7 and #8.

SPECIFICS OF SEARCH AND SEIZURE OF COMPUTER SYSTEMS

5. Based upon my knowledge, training, and experience, and the experience of other law enforcement personnel, I know that searches and seizures of evidence from computers commonly require agents to seize most of the computer items (hardware, software, and

instructions) to be processed later by a qualified computer expert in a laboratory or other controlled environment. That is almost always true because of the following:

A. Computer storage devices (like hard drives, diskettes, tapes, laser disks, and others) store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she may store it in random order with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This examination process can take weeks or months, depending on the volume of the data stored, and it would be impractical to attempt this kind of data search on site.

B. Searching computer systems for criminal evidence is a highly technical process requiring expert skills in a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. A search of a computer system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover "hidden", erased, compressed, password-protected, and other encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (both from external sources and from code embedded in the system as a "booby-trap"), the controlled environment of a laboratory is essential to its complete and accurate analysis.

BACKGROUND OF THIS INVESTIGATION

6. On April 22, 2004, SAC/Boston ICE fraud group agents received information, in Fall River, Massachusetts, that an individual named "Marcia ALMEIDA", a/k/a "Marcia FERREIRA DE ALMEIDA," with telephone number (508) 679-4262, could provide fraudulent green cards and social security cards to customers.

7. On April 28, 2004, an ICE Undercover Agent ("UCA") spoke to FERREIRA DE ALMEIDA on the telephone, and the call was recorded. FERREIRA DE ALMEIDA told UCA that she could provide to UCA a set of documents for \$180.00 (\$100.00 for a social security card and \$80.00 for a green card). She said that she required a photograph, name, date of birth, and signature in order to have the documents made. She also stated that she could provide same-day service, as long as she obtained the photographs/information in the morning so as to deliver the completed documents in the afternoon.

8. Following the first document purchase by UCA from FERREIRA DE ALMEIDA, which is described below, vehicle registration checks were completed by ICE agents regarding the vehicle (green Ford Explorer, Massachusetts registration 6235WW) operated by FERREIRA DE ALMEIDA during the purchase. The Massachusetts Registry of Motor Vehicles information showed that the vehicle was registered to "Marcia ALMEIDA," date of birth 02/17/73, of 486 Hope Street, Apt. #7, Fall River, Massachusetts. The check also showed that FERREIRA DE ALMEIDA had a Florida driver's license, #D453546735570. Subsequently, a digitized image of FERREIRA DE ALMEIDA was obtained from the State of Florida Department and Vehicle Information Database. According to the record, the name on the Florida driver's license was "Marcia FERREIRA DE ALMEIDA," DOB 02/17/73, with 5168 Loma Vista Circle, #112, Oviedo, Florida, as the listed address. The license, which was issued on

07/26/01, included driver's license/identification number D453-546-73-557-0. Later, on May 12, 2004, UCA identified the digitized image of FERREIRA DE ALMEIDA as that individual that UCA had met, on May 04, 2004, to purchase two sets of fraudulent documents as part of fraud document investigation.

9. Additional ICE and criminal database checks were conducted regarding FERREIRA DE ALMEIDA, and it was discovered that "Marcia F. DE ALMEIDA," date of birth 02/17/73, country of citizenship Brazil, was admitted to the United States as a B2 visitor for pleasure on June 20, 2001 at Orlando, Florida, and admitted for six months to December 19, 2001. No departure date was listed.

10. On May 06, 2004, the United States Postal Police confirmed that "Marcia ALMEIDA," a/k/a Marcia FERREIRA DE ALMEIDA, was receiving mail at 486 Hope Street, Apartment #7, Fall River, Massachusetts. On May 17, 2004, ICE agents received information from Verizon-New England that the telephone number (508) 679-4262, used by UCA to contact FERREIRA DE ALMEIDA, was under the name of "Fabio MACEDO" of 486 Hope Street, Suite 7, Fall River, Massachusetts. On May 25, 2004, I conducted a mailbox check at 486 Hope Street, Fall River, Massachusetts, and found three names written on Box #7 (of eight boxes), "Fabio MACEDO," "Tayla MACEDO," and "Marcia ALMEIDA."

CRIMINAL ACTIVITY

**A. FIRST CONTROLLED PURCHASE OF COUNTERFEIT DOCUMENTS**

11. On May 03, 2004, SAC/Boston ICE fraud group agents planned a document purchase from Marcia FERREIRA DE ALMEIDA in Fall River, Massachusetts. At approximately 12:08 PM, UCA placed a consensually monitored and recorded telephone call, in my presence, to FERREIRA DE ALMEIDA at (508) 679-4262. UCA spoke to her, and inquired if FERREIRA DE ALMEIDA could meet with UCA on May 04, 2004 to negotiate a purchase

of fraudulent documents. As a result of the conversation, it was decided that FERREIRA DE ALMEIDA would meet UCA in the parking lot of the Chaves Market & Gift Shop at 49 Columbia Street, Fall River, MA, at approximately 10:30 AM on May 04, 2004. The call terminated at approximately 12:12 PM.

12. On May 4, 2004, ICE fraud group agents met with UCA in Fall River, Massachusetts, prior to the meet with Marcia FERREIRA DE ALMEIDA. UCA was provided with two green-card style photographs to be presented to FERREIRA DE ALMEIDA for the manufacture of two fraudulent green cards. UCA provided the names, and dates of birth, for both persons pictured on the photos (written on the envelope to be presented to FERREIRA DE ALMEIDA), while UCA and the affiant each provided the signature of one of the names to be delivered to FERREIRA DE ALMEIDA (for the making of the green cards). UCA was also provided with \$360.00, money for the expressed purpose of purchasing two sets of fraudulent documents from Marcia FERREIRA DE ALMEIDA. ICE surveillance was established in the vicinity of the Chaves Market at approximately 9:40 AM.

13. At approximately 9:49 AM, UCA placed a consensually monitored and recorded telephone call, in my presence, to Marcia FERREIRA DE ALMEIDA at (508) 679-4262 to confirm their meeting for that date. UCA spoke to FERREIRA DE ALMEIDA, and told her that UCA would be at the meet location in about fifteen-twenty minutes. FERREIRA DE ALMEIDA told UCA that she would be driving a green Ford Explorer. The phone call ended at approximately 9:50 AM.

14. ICE surveillance observed UCA enter the parking lot adjacent to the Chaves Market at 49 Columbia Street at approximately 10:09 AM. At approximately 10:11 AM, a green Ford Explorer (Massachusetts registration 6235WW) was seen entering the lot, and parked near the UCA.

At approximately 10:12 AM, the meeting began and UCA subsequently entered the Ford Explorer. At approximately 10:15 AM, the meeting ended, and UCA exited FERREIRA DE ALMEIDA's vehicle. Both vehicles exited the parking lot at approximately 10:15 AM.

15. During the meeting, UCA provided the two green-card style photographs, information, and signatures to FERREIRA DE ALMEIDA for the manufacture of the fraudulent documents. It was agreed that they would meet again at 12:00 PM for the delivery of the completed documents.

16. Following the meeting, the green, Ford Explorer was surveilled by ICE agents until the vehicle was lost in traffic. A Massachusetts Registry of Motor Vehicles check of the vehicle revealed that it was registered to Marcia ALMEIDA, a/k/a Marcia FERREIRA DE ALMEIDA, of 486 Hope Street, Apt. #7, Fall River, Massachusetts. Following the receipt of this information, ICE agents located this vehicle parked in front of 486 Hope Street at approximately 10:47 AM.

17. ICE agents conducted fixed surveillance of this location until approximately 12:13 PM, when Marcia FERREIRA DE ALMEIDA was observed exiting 486 Hope Street carrying a small child. FERREIRA DE ALMEIDA entered the Ford Explorer and proceeded, without stopping, to the Chaves Market parking lot, which she entered at approximately 12:15 PM. UCA was observed by ICE surveillance entering the lot at approximately 12:17 PM, and subsequently entered the Ford Explorer at this time. UCA was seen leaving FERREIRA DE ALMEIDA's vehicle at approximately 12:22 PM. At approximately 12:23 PM, the Ford Explorer exited the parking lot, and was followed by ICE moving surveillance until the vehicle cleared the area. UCA was observed leaving the lot at approximately 12:25 PM.

18. UCA reported that, during the meeting, FERREIRA DE ALMEIDA related that she could meet UCA (for additional document purchases) anytime in the mornings Monday-Sunday (since she worked the second shift commencing at 2:00 PM). FERREIRA DE ALMEIDA stated that she would give UCA a \$10.00 discount per set beginning with the next purchase. She told UCA that her husband worked for a fiberglass company in Warwick, Rhode Island, and was seeking another job. UCA reported that after the documents were received, UCA then paid FERREIRA DE ALMEIDA the \$360.00 for the documents. UCA told FERREIRA DE ALMEIDA that a telephone call would be placed to her when more documents were needed.

19. Following the document purchase, I obtained the documents from UCA in Bridgewater, Massachusetts at approximately 12:50 PM. They included two fraudulent green cards (A273 659 001; in the name of Nelson SANTOS, DOB 7/15/68, and; A329 460 997, in the name of Wilton DA SILVA, DOB 10/2/73), two social security cards (Nelson SANTOS, #092-25-3927, and; Wilton DA SILVA, #045-29-7230), two photographs (which UCA had provided to FERREIRA DE ALMEIDA for the manufacture of the green cards), and the envelope with information written on it that UCS also had provided to FERREIRA DE ALMEIDA. The photos provided to FERREIRA DE ALMEIDA were those persons pictured on the fraudulent green cards.

**B. SECOND CONTROLLED PURCHASE OF COUNTERFEIT DOCUMENTS**

20. On May 21, 2004, SAC/Boston ICE fraud group agents planned a document purchase from FERREIRA DE ALMEIDA in Fall River, Massachusetts.

21. On May 21, 2004, at approximately 8:56 AM, UCA placed a consensually monitored and recorded telephone call, under my direction, to FERREIRA DE ALMEIDA at (508) 679-4262 in order to arrange a document purchase. UCA spoke to FERREIRA DE ALMEIDA, and told her that UCA needed to purchase two sets of documents. It was arranged that UCA would call FERREIRA DE ALMEIDA again on May 24, 2004 to confirm the time

and place of the document deal. The call terminated at approximately 8:58 AM.

22. On May 24, 2004, at approximately 12:58 PM, UCA placed a consensually monitored and recorded telephone call, under my direction, to FERREIRA DE ALMEIDA at (508) 679-4262 in order to confirm the time and place of the document buy. UCA spoke to her, and it was decided that the meeting would take place at 12:00 PM in the parking lot adjacent to Chaves Market, located at 49 Columbia Street, Fall River, Massachusetts. FERREIRA DE ALMEIDA also provided to UCA her cellular phone number, (774) 526-2002, as another means of contact. This call terminated at approximately 1:00 PM.

23. On May 25, 2004, at approximately 8:42 AM, I conducted a vehicle check at 486 Hope Street, Fall River, Massachusetts, and located the 1995 green Ford Explorer with Massachusetts registration #6235WW that FERREIRA DE ALMEIDA had used on May 4, 2004 to meet UCA for the document purchase. The vehicle was observed parked on Hope Street in front of #486. I then conducted a mailbox check at 486 Hope Street, and found the names "Fabio MACEDO, Tayla MACEDO, and Marcia ALMEIDA" written on the seventh box, of eight boxes (the boxes were not numbered), that were affixed to the building.

24. At approximately 9:45 AM, UCA received a non-monitored, non-recorded telephone call from FERREIRA DE ALMEIDA, in which she stated that since she did not have to bring her child to school, she could meet with UCA at any time on this date. UCA, however, told FERREIRA DE ALMEIDA that it was not known if UCA could meet her earlier than previously arranged.

25. At approximately 11:00 AM, ICE fraud group agents met with UCA at a location near the meeting place between UCA and FERREIRA DE ALMEIDA. I provided UCA with four green-card style photographs, which

included a name and date of birth on the reverse of each photograph) and signatures for each individual on a separate paper. The photographs and signatures were to be presented by UCA to FERREIRA DE ALMEIDA for the purpose of manufacturing four sets of fraudulent documents. I also provided UCA with \$680.00 official funds for the purpose of purchasing four sets of fraudulent documents from FERREIRA DE ALMEIDA.

26. At approximately 11:15 AM, ICE fraud group agents established surveillance in the area of the meeting site (Chaves Market, 49 Columbia Street, Fall River, Massachusetts) and at 486 Hope Street, Fall River, Massachusetts.

27. At approximately 11:20 AM, UCA placed a consensually monitored and recorded telephone call to FERREIRA DE ALMEIDA at (508) 679-4262 and spoke to her. As a result of the call, UCA would meet with FERREIRA DE ALMEIDA in the parking lot adjacent to Chaves Market in approximately fifteen minutes. The call ended at approximately 11:21 AM.

28. At approximately 11:30 AM, Marcia FERREIRA DE ALMEIDA was observed leaving 486 Hope Street and entering the target vehicle (green, Ford Explorer with Massachusetts tag 6235WW) with a small child. The vehicle was surveilled to the Chaves Market, where it parked, without making prior stops, on the street adjacent to the lot at approximately 11:32 AM. At approximately 11:34 AM, UCA entered the lot, and, subsequent to this, FERREIRA DE ALMEIDA moved her vehicle into the parking lot. At approximately 11:35 AM, UCA left the vehicle, and entered into FERREIRA DE ALMEIDA's Ford Explorer. During this meeting, UCA delivered the photos and signatures to FERREIRA DE ALMEIDA, who told UCA that the finished documents would be completed in ninety (90) minutes, and that she would telephone UCA upon their completion. At approximately 11:37 AM, UCA exited the vehicle, and the meeting

terminated. FERREIRA DE ALMEIDA left the parking lot at approximately 11:38 AM, and UCA left the lot at approximately 11:39 AM.

29. Following the meeting, the target vehicle was surveilled, without stopping, back to 486 Hope Street, Fall River, Massachusetts, at approximately 11:40 AM. FERREIRA DE ALMEIDA exited the vehicle, with the child, and re-entered 486 Hope Street.

30. At approximately 12:30 PM, UCA placed a non-monitored, non-recorded telephone call, under my direction, to FERREIRA DE ALMEIDA at (774) 526-2002 and spoke to her. The purpose of the call was to determine if FERREIRA DE ALMEIDA had placed a call, which UCA missed, to UCA since their meeting. FERREIRA DE ALMEIDA related to UCA that she had not made a call (to UCA), and did not provide additional information to UCA regarding the time when the documents would be completed.

31. At approximately 1:47 PM, UCA placed another non-monitored, non-recorded telephone call, under the direction of the affiant, to FERREIRA DE ALMEIDA at (508) 679-4262 to inquire about the status of the documents. UCA spoke to FERREIRA DE ALMEIDA, who stated that the documents would be completed in fifteen minutes.

32. At approximately 1:54 PM, the UCA was surveilled entering the Chaves Market parking lot. At approximately 2:19 PM, FERREIRA DE ALMEIDA was observed leaving 486 Hope Street, with a child, and entering the target vehicle (green Ford Explorer with Massachusetts registration 6235WW). The vehicle was followed, by ICE agents, to the Chaves Market parking lot, without stopping, and entered at approximately 2:21 PM. At approximately 2:22 PM, UCA entered into the target vehicle, and obtained, from FERREIRA DE ALMEIDA, the completed documents, and then paid to FERREIRA DE ALMEIDA \$680.00. UCA mentioned to FERREIRA DE ALMEIDA that UCA would telephone her when more documents were needed. FERREIRA DE ALMEIDA suggested to UCA that they should meet at a

different location for the next meet, since others might think that they were selling/buying drugs. UCA offered to meet at FERREIRA DE ALMEIDA's residence during the next meet. At approximately 2:23 PM, the meeting ended and UCA exited the target vehicle. Both vehicles left the parking lot at approximately 2:24 PM. FERREIRA DE ALMEIDA's vehicle was surveilled out of the area by ICE agents.

33. Following the meet, and at a nearby location, I obtained the documents from the UCA. Enclosed in a white envelope were four fraudulent green cards, four fraudulent social security cards, and the four photographs that had been delivered to FERREIRA DE ALMEIDA earlier that date by the UCA. The names on the green cards included: Francisco JARDIM (A735 910 226, DOB 8/15/76), Jose LIMA (A795 329 001, DOB 10/26/63), Antonio NEVES (A958 673 209, DOB 11/29/67), and; Paulo MIRANDA (A971 623 557, DOB 3/4/82). The names on the social security cards included: Francisco JARDIM (029-78-9225), Jose LIMA (069-81-3028), Antonio NEVES (078-22-3901), and; Paulo MIRANDA (045-91-2732). I confirmed that the individuals pictured on the green cards were the same individuals pictured in the photographs that had been given by UCA to FERREIRA DE ALMEIDA earlier on that date.

C. THIRD CONTROLLED PURCHASE OF COUNTERFEIT DOCUMENTS

34. On June 08, 2004, SAC/Boston ICE fraud group agents planned a document purchase from FERREIRA DE ALMEIDA in Fall River, Massachusetts.

35. On June 08, 2004, at approximately 9:53 AM, UCA, under my direction, placed a consensually monitored and recorded telephone call to FERREIRA DE ALMEIDA at cell phone number (774) 526-2002. UCA spoke to FERREIRA DE ALMEIDA, and arranged a meeting to negotiate a purchase of documents on June 09, 2004, at 10:00 AM in the parking lot of

Walgreen's Drug Store, located at 369 Plymouth Ave., Fall River, Massachusetts. UCA told FERREIRA DE ALMEIDA that four sets of documents were needed for purchase.

36. On June 09, 2004, I (along with other ICE fraud agents), met with UCA prior to the meeting between UCA and FERREIRA DE ALMEIDA. I provided UCA with four green-card style photographs, complete with names and dates of birth written on the reverse of each photo (the photos, on the previous date, had been given fictitious names and dates of birth by both UCA and myself), and signatures (which also had been completed by UCA and myself on the previous date) in the names given for the four persons. In addition, I provided UCA with \$680.00 official funds for the purpose of payment to FERREIRA DE ALMEIDA for four finished sets of fraudulent documents.

37. At approximately 9:20 AM, surveillance was established by ICE fraud agents at 486 Hope Street, Fall River, Massachusetts, and in the area of 369 Plymouth Ave., Fall River, Massachusetts, the site of the meeting place. At this time, the green, Ford Explorer (Massachusetts tag 6235WW), operated by FERREIRA DE ALMEIDA during two prior document purchases between her and UCA, was observed parked in front of 486 Hope Street.

38. At approximately 9:37 AM, UCA was observed entering the Walgreen's parking lot at 369 Plymouth Ave., Fall River, Massachusetts, and parking.

39. At approximately 10:00 AM, UCA received a non-monitored and non-recorded telephone call from FERREIRA DE ALMEIDA, who told UCA that she would be at the meet location soon. At approximately 10:06 AM, ICE surveillance observed FERREIRA DE ALMEIDA exiting 486 Hope Street with a small child, entering the green, Ford Explorer, and driving to the meet location at 369 Plymouth Ave., Fall River, Massachusetts, which she

entered at approximately 10:09 AM. UCA entered the Ford Explorer at this time, and exited at approximately 10:11 AM. During this meeting, UCA handed to FERREIRA DE ALMEIDA the photographs and signatures located in a white envelope. FERREIRA DE ALMEDIA told UCA that she would telephone UCA in a few hours.

40. At approximately 10:11 AM, the green Ford Explorer was surveilled exiting 369 Plymouth Ave., Fall River, Massachusetts, and operating down Rodman Street to South Main Street, where the vehicle made a right turn on South Main Street, and parked on the side of the street at approximately 10:15 AM. ICE fraud group agents observed FERREIRA DE ALMEIDA (and child) exiting the vehicle and moving (on foot) back toward the intersection of South Main Street and Rodman Street, where they entered a Brooks Pharmacy, located at 233 South Main Street, Fall River, Massachusetts, at approximately 10:18 AM. A member of the ICE fraud squad followed FERREIRA DE ALMEIDA into the Brooks Pharmacy, and observed her purchasing two packs of self-adhesive laminate and a roll of scotch tape. FERREIRA DE ALMEIDA (and child) left the Brooks Pharmacy at approximately 10:24 AM, and were surveilled back to the Ford Explorer, which they entered at approximately 10:25 AM. Subsequently, the vehicle was surveilled back to 486 Hope Street at approximately 10:30 AM, where FERREIRA DE ALMEIDA (and child) entered the building. ICE fraud agents conducted fixed surveillance of 486 Hope Street following the return of FERREIRA DE ALMEIDA to the address.

41. At approximately 12:06 PM, UCA received a non-monitored and non-recorded telephone call from FERREIRA DE ALMEDIA, who told UCA that she would be at the meet location to meet with UCA soon.

42. At approximately 12:10 PM, UCA was observed entering the Walgreen's parking lot at 369 Plymouth Ave., Fall River, Massachusetts, and parking. At approximately 12:11 PM, ICE surveillance observed

FERREIRA DE ALMEIDA (and child) exiting 486 Hope Street, and entering the Ford Explorer. FERREIRA DE ALMEIDA was followed to the Walgreen's parking lot by ICE surveillance, which the vehicle entered at approximately 12:14 PM. UCA entered the Ford Explorer at this time, and received the completed documents from FERREIRA DE ALMEIDA. UCA then paid to FERREIRA DE ALMEIDA \$680.00 for the documents. During this meeting, FERREIRA DE ALMEIDA inquired of UCA if Brazilian licenses were needed, which she could provide, for \$80.00. UCA asked FERREIRA DE ALMEIDA if she provided other documents, such as Massachusetts driver licenses. FERREIRA DE ALMEIDA stated no to this question. The meeting terminated at approximately 12:16 PM, and UCA exited the Ford Explorer. Subsequently, the Ford Explorer left the parking lot, and was surveilled out of the area.

43. Following the meet, and at a nearby location, I obtained the completed documents from the UCA. Enclosed in a white envelope were four fraudulent green cards, four fraudulent social security cards, the four photographs that had been delivered to FERREIRA DE ALMEIDA earlier that date by UCA, and three of the signatures also provided to FERREIRA DE ALMEIDA earlier. One of the signatures was not returned. The names on the green cards included: Pedro SOARES (A765 119 302, DOB 11/29/65), Flavio MAGALHAES (A592 401 663, DOB 9/19/63), Carlos SEBASTIAO (A922 701 663, DOB 3/15/74), and; Renato DEMELO (A679 227 018, DOB 1/13/67). The names on the social security cards included: Pedro SOARES (376-92-6739), Flavio MAGALHAES (302-78-0129), Carlos SEBASTIAO (273-69-7537), and Renato DEMELO (437-69-2235). I confirmed that the individuals pictured in the green cards were the same persons pictured in the photographs provided, earlier that date, by UCA to FERREIRA DE ALMEIDA.

D. FOURTH CONTROLLED PURCHASE OF COUNTERFEIT DOCUMENTS

44. On July 16, 2004, SAC/Boston ICE fraud group agents planned a document purchase from FERREIRA DE ALMEIDA in Fall River, Massachusetts.

45. On July 16, 2004, at approximately 12:57 PM, UCA, under my direction, placed a consensually monitored and recorded telephone call to FERREIRA DE ALMEIDA at cell phone number (774) 526-2002 and spoke to her. As a result of the call, a meeting was arranged between FERREIRA DE ALMEIDA and UCA to negotiate a purchase of fraudulent documents on July 19, 2004 in Fall River, Massachusetts, in the morning hours. No time or place was agreed upon during the phone call, and it was arranged that UCA would telephone FERREIRA DE ALMEIDA on July 19, 2004 to determine the time and place of the meeting. The phone call terminated at approximately 12:59 PM.

46. On July 19, 2004, at approximately 09:21 AM, UCA, under my direction, placed a consensually monitored and recorded telephone call to FERREIRA DE ALMEIDA at phone number (508) 679-4262 and spoke to her. A meeting time of 10:00 AM at the Walgreen's Drug Store parking lot, located at 369 Plymouth Ave., Fall River, Massachusetts, was arranged for the meeting. The phone call terminated at approximately 09:22 AM.

47. Before the arranged meeting between UCA and FERREIRA DE ALMEIDA, I provided UCA with two green-card style photographs (with names and dates of birth on reverse) and signatures for delivery to FERREIRA DE ALMEIDA, and \$340.00 official funds to be utilized for the purchase of two sets of fraudulent documents from Marcia FERREIRA DE ALMEIDA.

48. At approximately 09:30 AM, surveillance was established by SAC/Boston ICE fraud agents at 486 Hope Street, Fall River, Massachusetts, and in the area of 369 Plymouth Ave., Fall River,

Massachusetts, the site of the meeting place. At this time, the green Ford Explorer (Massachusetts registration 6235WW), previously operated by FERREIRA DE ALMEIDA during three prior document purchases between UCA and her, was observed parked in front of 486 Hope Street.

49. At approximately 09:48 AM, FERREIRA DE ALMEIDA was observed exiting 486 Hope Street, accompanied by a small child, entering the Ford Explorer, and leaving the area. The vehicle was followed by ICE surveillance, without stopping, to the parking lot of Walgreen's Drug Store at 369 Plymouth Ave., which the vehicle entered at approximately 09:54 AM. At approximately 09:59 AM, the UCA vehicle entered the parking lot, and the meet commenced (between UCA and FERREIRA DE ALMEIDA) at approximately 10:00 AM, with UCA entering the Ford Explorer. UCA delivered the photographs and signatures to FERREIRA DE ALMEIDA during the meeting, who told UCA that the documents would be finished at approximately 12:00 PM. FERREIRA DE ALMEIDA told UCA that she would telephone UCA when the documents were completed. The meeting concluded at approximately 10:01 AM, and UCA exited the Ford Explorer, which was operated out of the lot by FERREIRA DE ALMEIDA. ICE surveillance subsequently followed the vehicle, which made no stops, back to 486 Hope Street at approximately 10:06 AM. Both FERREIRA DE ALMEIDA and child were observed entering 486 Hope Street at this time.

ICE agents conducted fixed surveillance of 486 Hope Street following the return of FERREIRA DE ALMEIDA to the location.

50. At approximately 11:15 AM, UCA received a non-monitored and non-recorded telephone call from FERREIRA DE ALMEIDA, who told UCA that she would be at the meeting place in approximately fifteen minutes.

51. At approximately 11:30 AM, ICE surveillance observed FERREIRA DE ALMEIDA exiting 486 Hope Street, accompanied by two children, and entering the Ford Explorer. The vehicle was followed by

ICE surveillance, without stopping, to the Walgreen's Drug Store parking lot at 369 Plymouth Ave., at which time the vehicle entered at approximately 11:31 AM. At approximately 11:32 AM, UCA entered the Ford Explorer, and the meeting began. FERREIRA DE ALMEIDA handed to UCA the completed documents, who then handed \$340.00 to FERREIRA DE ALMEIDA. UCA, in addition, told FERREIRA DE ALMEIDA that another call would be made to her if more documents were needed. At approximately 11:33 AM, UCA exited the vehicle, and the meeting was completed. At this time, the target vehicle exited the parking lot, and was followed by ICE surveillance until it left the area.

52. Following the meet, I obtained the completed documents from UCA. Enclosed in a white envelope were two fraudulent green cards, two fraudulent social security cards, the two photographs that had been delivered to FERREIRA DE ALMEIDA earlier that date by UCA, and the signatures (written on separate papers) also provided by UCA to FERREIRA DE ALMEIDA earlier. The names on the green cards included: Valdemar F. SANTOS (A873 401 265, DOB 6/14/75) and Jose M. PACHECO (A791 856 992, DOB 2/21/53). The names on the social security cards included: Valdemar F. SANTOS (028-79-3225) and Jose M. PACHECO (081-92-7523).

53. In total, UCA purchased 24 fraudulent documents (twelve fraudulent green cards and twelve fraudulent social security cards) from FERREIRA DE ALMEIDA in the four controlled purchases described above. I have reviewed the documents and have determined that they are counterfeit identification documents.

54. Based on my experience in this and other fraudulent document investigations, I am familiar with the tools, equipment, and materials necessary for the manufacture of counterfeit green cards and social security cards. I am aware that the common types of tools, equipment, and materials used in the manufacturing of said documents are a

computer, computer printer, computer document scanner, color copier, camera, typewriter, plastic laminate, a sealing mechanism, ink pads, blank alien registration cards, and blank social security cards.

CONCLUSION

55. Based on the facts set forth above, I believe there is probable cause to conclude that Marcia FERREIRA DE ALMEIDA, on May 04, 2004, May 25, 2004, June 09, 2004, and July 19, 2004, did knowingly transfer an identification document knowing that such document was produced without authority, in violation of Title 18, United States Code, Section 1028(a)(2).

56. Based on the facts set forth above, I also believe there is probable cause to believe that the property sought to be seized, which is listed and described in the Schedule A attached hereto, is located in Apartment #7, 486 Hope Street, Fall River, Massachusetts, which premises are more particularly described above, and constitutes evidence of the commission of a criminal offense and contraband, the fruits of crime, and things otherwise criminally possessed, and property designed and intended for use and which is and has been used as the means for committing criminal offenses, in violation of Title 18, United States Code, Section 1028(a)(2).

Thomas L. Ohlson

Thomas L. Ohlson  
Special Agent  
United States Bureau of Immigration  
and Customs Enforcement

Subscribed and sworn before me this 5<sup>th</sup> day of August, 2004

Lawrence P. Cohen  
Lawrence P. Cohen  
United States Magistrate Judge

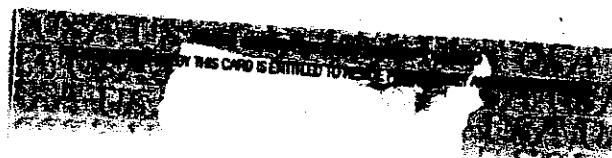
SCHEDULE A

I seek a search warrant for the premises located at 486 Hope Street, Apartment #7, Fall River, Massachusetts, because I believe probable cause exists to conclude that there is presently located within said premises the following, which is property that constitutes evidence of the commission of a criminal offense, contraband, fruits of crime, and things otherwise criminally possessed, and property that is intended for use or has been used as a means of committing a criminal offense:

- A. blank and/or typewritten green cards; blank and/or typewritten social security cards, and; other blank and/or typewritten identification documents;
- B. color copiers and cameras;
- C. typewriters; typewriter ribbons and/or cartridges; plastic laminators; plastic laminate; paper cutters; scissors; glue, and; ink pads;
- D. notebooks; journals; address books; customer lists and/or records listing names, dates, numbers, and cash payments;
- E. United States currency or all records relating to transfers of cash, including checks, cashier's checks, credit cards, and money order forms.
- F. Any computer(s) and all related computer equipment, including: scanners, peripherals; related instructions in the form of manuals, as well as the software used to operate the computer(s), and: any CD-ROMS; zip disks; floppy disks; DVDs, and; other magnetic storage devices. The subsequent forensic analysis of these items is to be limited to searching for evidence of the unlawful manufacture and sale of counterfeit green cards, social security cards, and other identification documents.

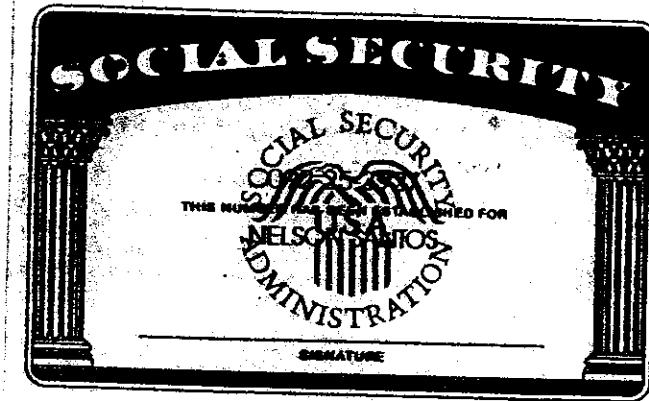


Fraud docs. received  
by UCA from Marcia  
ALMEIDA in Fall  
River on 5/4/04  
for \$360.00



TEMP RES ADJ DATE 09-15-00  
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830122<<F<<IMIGRA<<FRKXW04<<  
SANTOS<NELSON<<<<<<<<<<<<





This card is the official verification of your Social Security number.  
Please sign it right away. Keep it in a safe place.  
Improper use of this card or number by anyone is punishable by fine,  
imprisonment or both.

This card belongs to the Social Security Administration and you must  
return it if we ask for it.

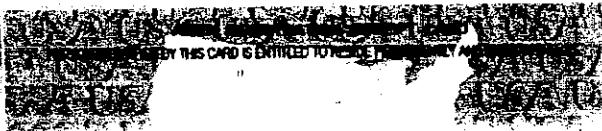
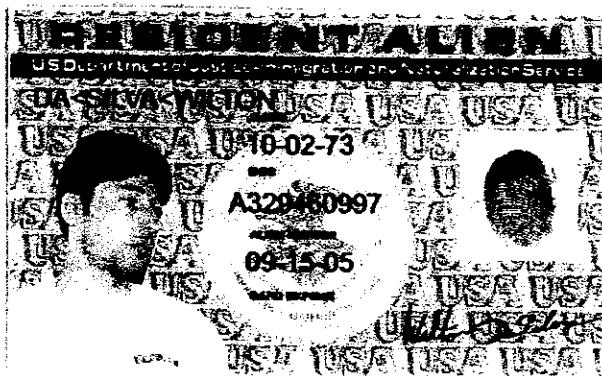
If you find a card that isn't yours, please return it to:  
Social Security Administration

P.O. Box 33008, Baltimore, MD 21290-3008

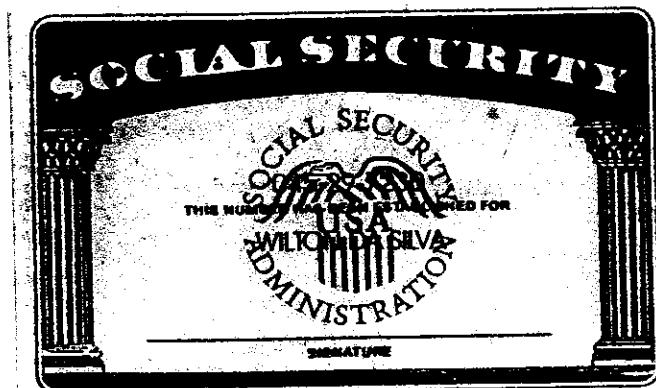
For any other Social Security business/information, contact your  
local Social Security office. If you write to the above address for any  
business other than returning a found card, it will take longer for us  
to answer your letter.

Social Security Administration  
Form SSA-3000 (6-99)

036089249



TEMP RES ADJ DATE 09-15-00  
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DA<SILVA<WILTON<<<<<<<<



This card is the official verification of your Social Security number.  
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P.O. Box 33008, Baltimore, MD 21290-3008

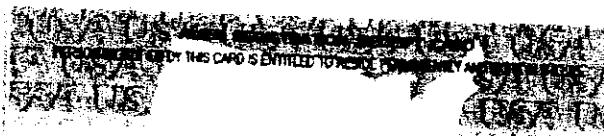
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Social Security Administration  
Form SSA-3000 (6-99)

**D36089249**

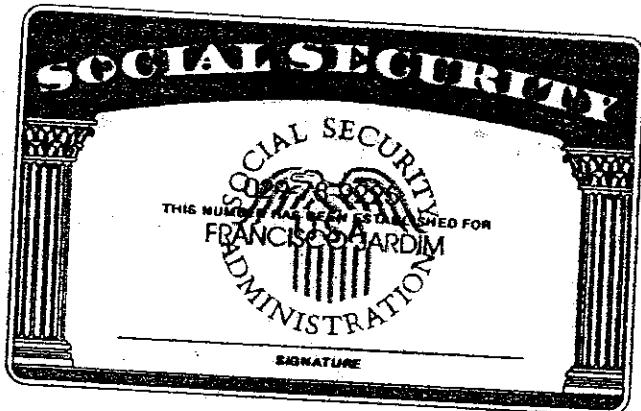


4 sets of docs.  
received by UCA  
from Marcia  
ALMEIDA in  
Fall River on  
5/25/04 for  
\$ 680.00



TEMP RES ADJ DATE 10-12-01  
A1USA735910226<<HR342<<919M<<  
830122<<F<<IMIGRA<<FRKXW04<<  
JARDIM<FRANCISCO<<<<<<<<<<





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imprisonment or both.

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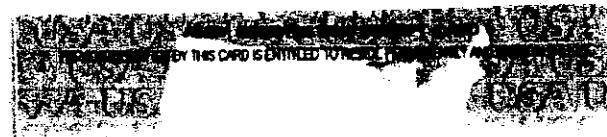
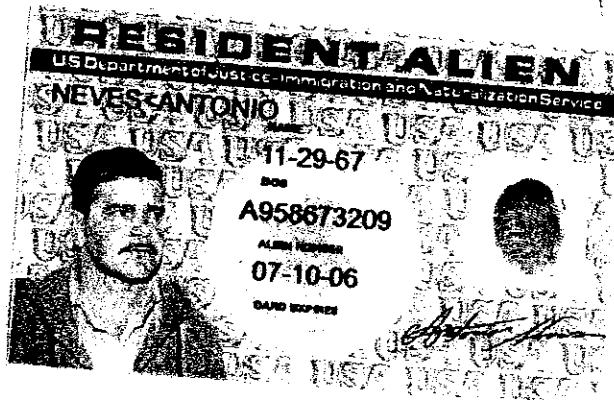
If you find a card that isn't yours, please return it to:

Social Security Administration  
P.O. Box 33008, Baltimore, MD 21290-3008

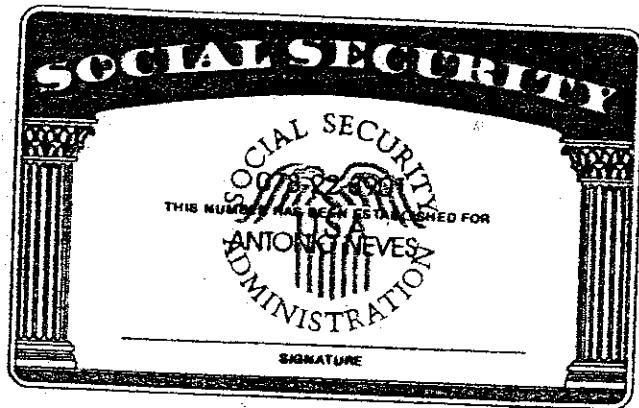
For any other Social Security business/information, contact your  
local Social Security office. If you write to the above address for any  
business other than returning a found card, it will take longer for us  
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Social Security Administration  
Form SSA-3000 (6-99)

**D36089249**



TEMP RES ADJ DATE 07-10-01  
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NEVES<ANTONIO<<<<<<<<<<<<



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imprisonment or both.

This card belongs to the Social Security Administration and you must  
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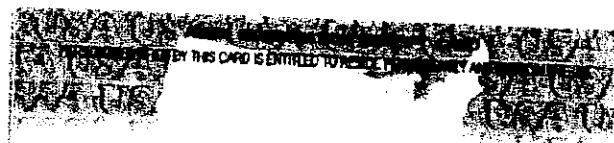
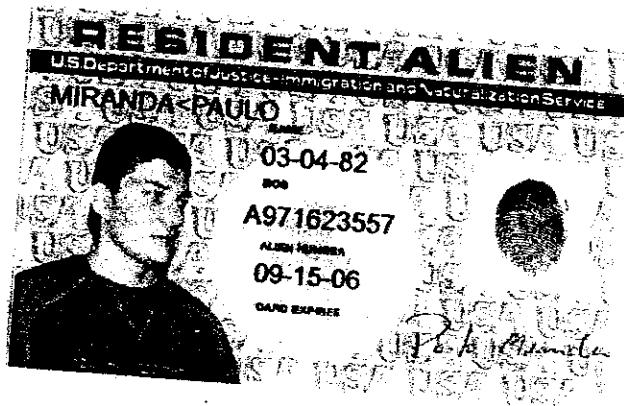
If you find a card that isn't yours, please return it to:  
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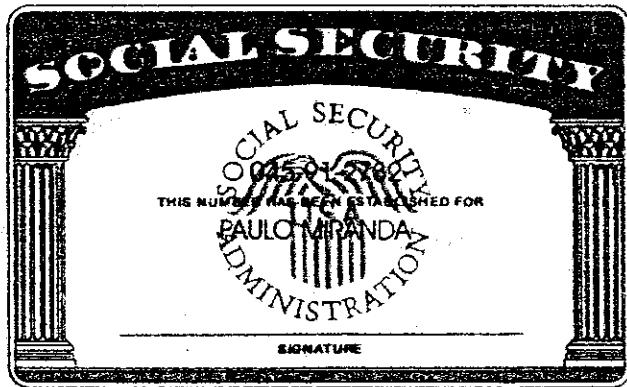
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to answer your letter.

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Form SSA-3000 (6-99)

036089249



TEMP RES ADJ DATE 09-15-01  
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MIRANDA<PAULO<<<<<<<<<<<<<



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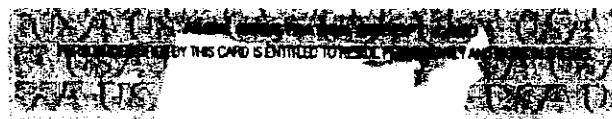
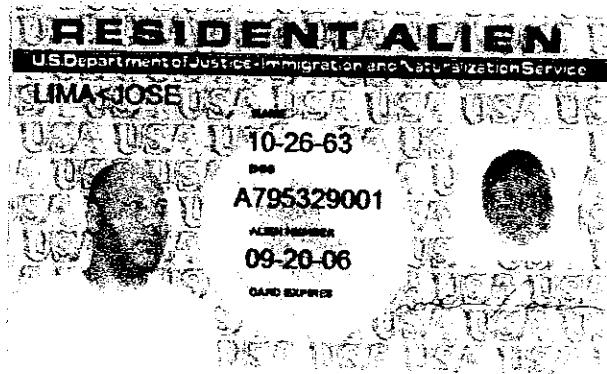
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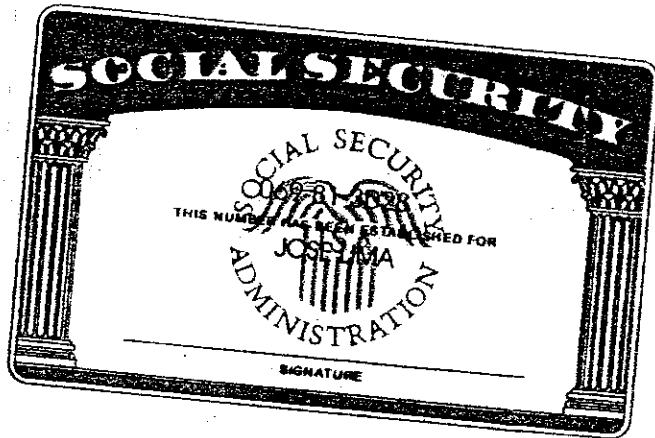
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D36089249



TEMP RES ADJ DATE 09-20-01  
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LIMA<JOSE<<<<<<<<<<<<<



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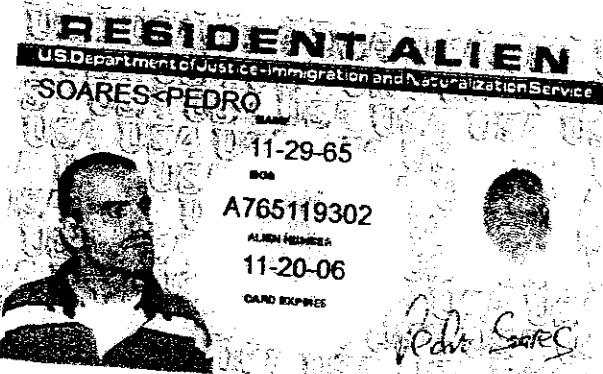
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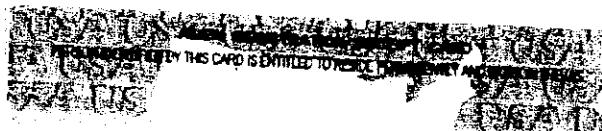
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Social Security Administration  
Form SSA-3000 (6-99)

**036089249**

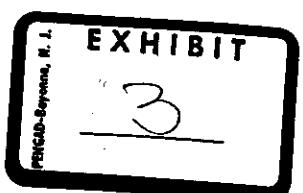


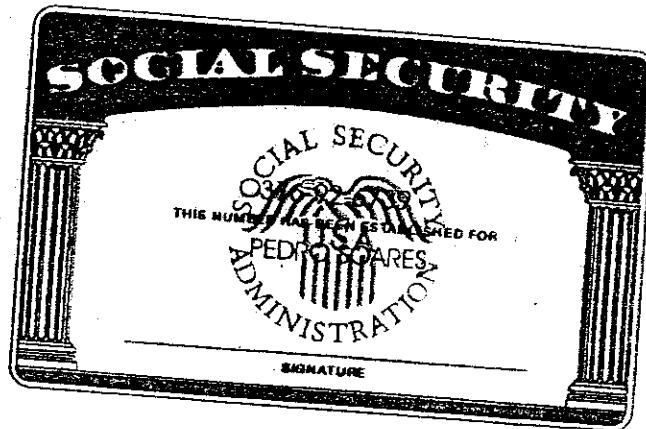
4 sets of  
docs received  
by UCA from  
Marcia ALMEIDA  
in Fall River cn  
6/9/04 for  
\$680.00



TEMP RES ADJ DATE 11-20-01  
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830122<<F<<IMIGRA<<FRKXW04<<  
SOARES<PEDRO<<<<<<<<<<<<

Pedro Soares





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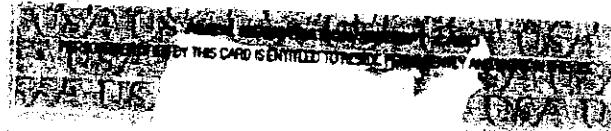
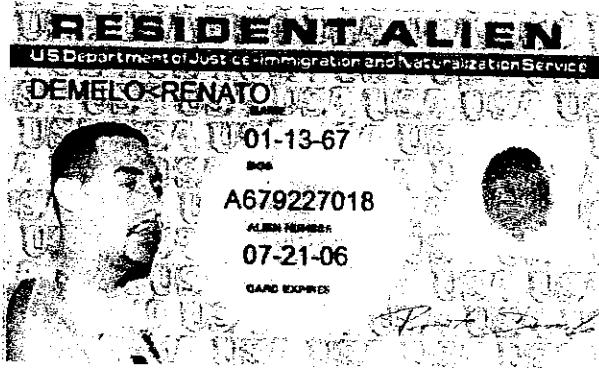
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**D36089249**



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DEMELO<RENATO<<<<<<<<<<<<



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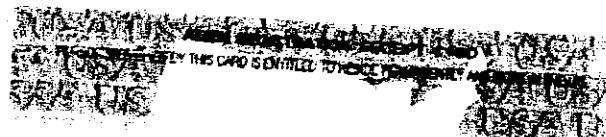
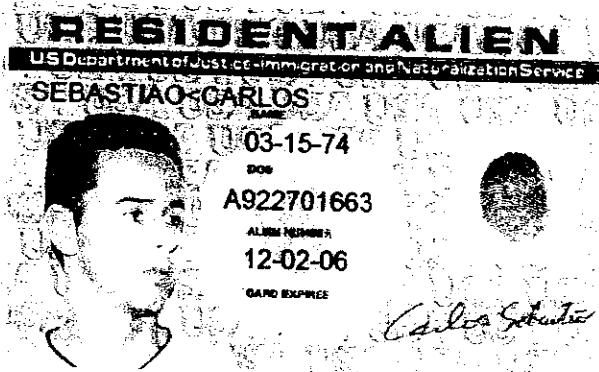
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036089249



TEMP RES ADJ DATE 12-02-01  
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830122<<F<<IMIGRA<<FRKXW04<<  
SEBASTIAO<CARLOS<<<<<<<<<<

*Carlos Sebastian*



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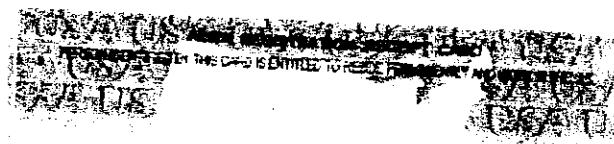
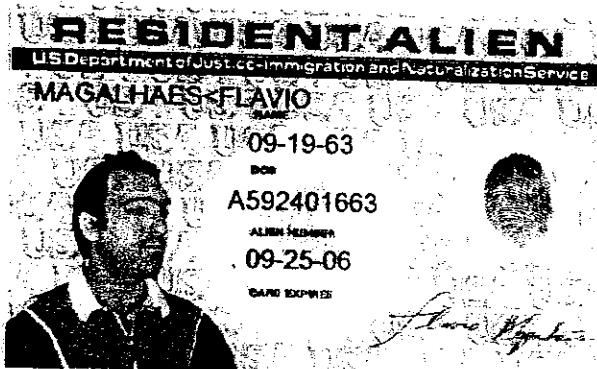
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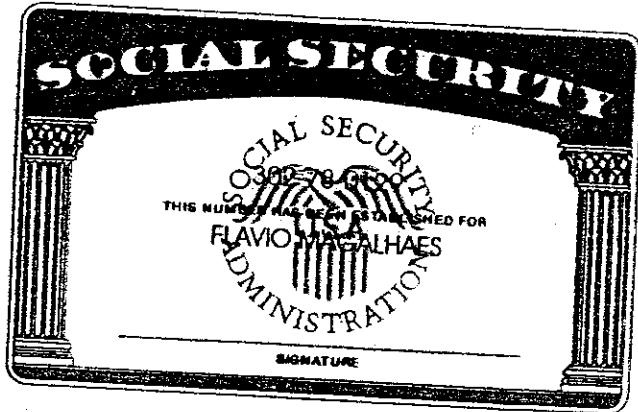
Social Security Administration  
Form SSA-3000 (6-99)

**D36089249**



TEMP RES ADJ DATE 09-25-01  
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MAGALHAES<FLAVIO<<<<<<

*Flavio Magalhaes*



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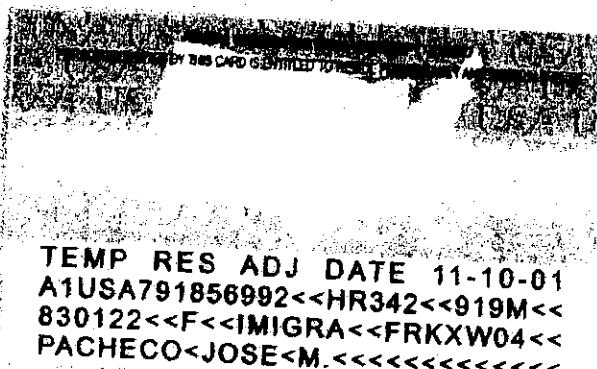
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Social Security Administration  
Form SSA-3000 (6-99)

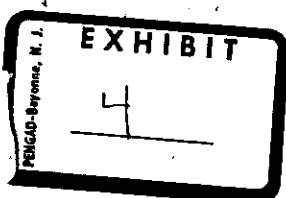
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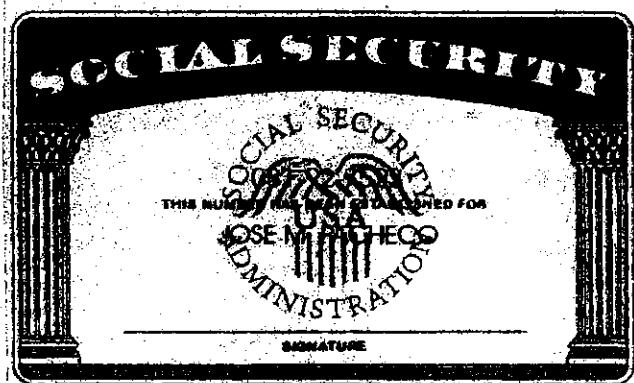


2 sets of  
documents bought  
by UCA from  
Marcia ALMEIDA  
on 7/19/04 in  
Fall River, MA  
for \$340.00.



TEMP RES ADJ DATE 11-10-01  
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830122<<F<<IMIGRA<<FRKXW04<<  
PACHECO<JOSE<M.<<<<<<<<<





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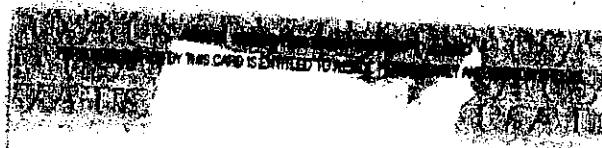
If you find a card that isn't yours, please return it to:

Social Security Administration  
P.O. Box 33008, Baltimore, MD 21290-3008

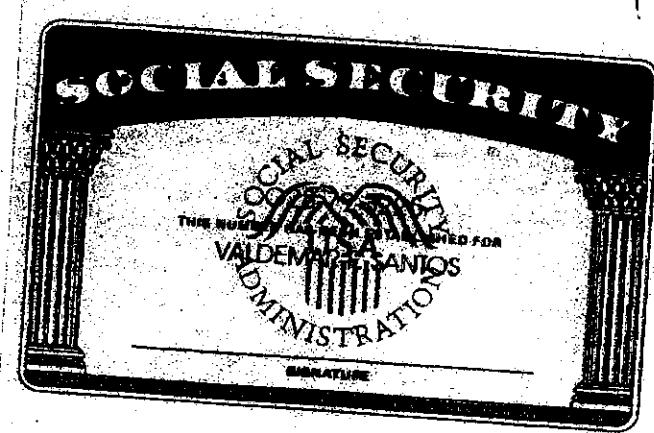
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to answer your letter.

Social Security Administration  
Form SSA-3000 (6-99)

D36089249



TEMP RES ADJ DATE 10-15-01  
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830122<<F<<IMIGRA<<FRKXW04<<  
SANTOS<VALDEMAR<F.<<<<<<<<<



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Form SSA-3000 (6-99)

D36089249

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Fall River Category No. II Investigating Agency ICECity Fall River**Related Case Information:**County BristolSuperseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Marcia Ferreira de Almeida Juvenile  Yes  No

Alias Name \_\_\_\_\_

Address 486 Hope Street, Apartment 7, Fall River, MABirth date (Year only): 1973 SSN (last 4 #): \_\_\_\_\_ Sex f Race: \_\_\_\_\_ Nationality: Brazil

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Dena T. Sacco Bar Number if applicable \_\_\_\_\_Interpreter:  Yes  No List language and/or dialect: portugueseMatter to be SEALED:  Yes  No Warrant Requested  Regular Process  In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

 Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_. Already in State Custody \_\_\_\_\_  Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document:  Complaint  Information  IndictmentTotal # of Counts:  Petty \_\_\_\_\_  Misdemeanor \_\_\_\_\_  Felony \_\_\_\_\_

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: August 5, 2004 Signature of AUSA: Dena Sacco

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District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Marcia Ferreira de Almeida

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. 1028(a)(2)</u>	<u>knowingly producing false documents</u>	_____
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

## ADDITIONAL INFORMATION: